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August 11, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
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So., Ag Stop 0268  
Washington, DC 20250

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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Earthbound Farm supports the continued allowance of the following substances, based on the careful review of these substances originally conducted, which resulted in their inclusion on the National List:

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Chlorine materials--disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide;	§206.605 (b)	<p>Chlorine materials are essential to enable fresh-cut produce processors to maintain proper sanitation and food safety. Further, current regulations ensure that residual chlorine levels do not exceed Safe Drinking Water Standards of 4ppm.</p> <p>If the water used to wash fresh cut produce is not properly sanitized, it can become a source of microbiological contamination.</p> <p>The value gained by the public health protection afforded by this material, particularly in light of such low allowable residual levels, would surely outweigh any objections, especially given that there are no suitable organic alternatives.</p> <p>The only other material with comparable sanitizing properties is Ozone, which is also on this Sunset Review.</p>	NOSB argumentation

Ozone	§205.605 (b)	See notes on Chlorine above.	NOSB argumentation
Acids (Alginic; Citric-- produced by microbial fermentation of carbohydrate substances; and Lactic).	§205.605 (a)	This is an important substance that helps prevent browning, as well as neutralize the pH of water so that we can use the smallest amount of chlorine yet allow maximum potential for it to function as an effective sanitizing agent, to protect public health.	NOSB argumentation
Soap-based algicide / Demossers	§205.601(a)(4) or §205.601(a)(7)	Algicide	NOSB Argumentation
Soap based herbicides	§205.601(b)(1)	Weed Control	NOSB Argumentation
Mulches i. Newspapers or other recycled paper ii. Plastic Mulch and covers	§205.601(b)(2)(i) and (ii)	Weed Control	NOSB Argumentation (we exclude colored paper)
Boric Acid	§205.601(e)(2)	Insect Control	NOSB Argumentation
Elemental Sulfur	§205.601(e)(3) or §205.601(e)(4)	Insect Control	NOSB Argumentation
Lime Sulfur	§205.601(e)(4) or §205.601(e)(5)	Insect Control	NOSB Argumentation
Oils, horticultural	§205.601(e)(5) or §205.601(e)(6)	Insect Control	NOSB Argumentation
Soaps, insecticidal	§205.601(e)(6) or §205.601(e)(7)	Insect Control	NOSB Argumentation
Sticky traps / barriers	§205.601(e)(7) or §205.601(e)(8)	Insect Control	NOSB Argumentation
Coppers, fixed	§205.601(i)(1)	Plant Disease Control	NOSB Argumentation
Copper sulfate	§205.601(i)(2)	Plant Disease Control	NOSB Argumentation
Hydrated lime	§205.601(i)(3)	Plant Disease Control	NOSB Argumentation
Hydrogen peroxide	§205.601(i)(4)	Plant Disease Control	NOSB Argumentation
Lime Sulfur	§205.601(i)(5)	Plant Disease Control	NOSB Argumentation
Oils, horticultural	§205.601(i)(6)	Plant Disease Control	NOSB Argumentation
Potassium bicarbonate	§205.601(i)(7) or §205.601(i)(8)	Plant Disease Control	NOSB Argumentation
Elemental Sulfur	§205.601(i)(8) or §205.601(i)(9)	Plant Disease Control	NOSB Argumentation

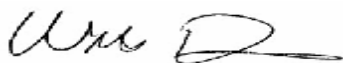
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Elemental Sulfur	§205.601(j)(2)	Plant or Soil Amendments	NOSB Argumentation
Humic Acids	§205.601(j)(3)	Plant or Soil Amendments	NOSB Argumentation
Lignin Sulfonate	§205.601(j)(4)	Plant or Soil Amendments	NOSB Argumentation
Magnesium sulfate	§205.601(j)(5)	Plant or Soil Amendments	NOSB Argumentation
Micronutrients i. Soluble Boron ii. Sulfates, Carbonates, oxides of Silicates of Zinc, Copper, Iron, Manganese, Molybdenum, Selenium and cobalt	§205.601(j)(6)(i) and (ii)	Plant or Soil Amendments	NOSB Argumentation
Liquid fish products	§205.601(j)(7)	Plant or Soil Amendments	NOSB Argumentation

These substances are valuable and appropriate resources to the organic farmers and processors who are working diligently to meet the rapidly expanding consumer demand for organic food.

Sincerely,



Will Daniels  
Director, Quality Assurance

Cc: Organic Trade Association  
National Organic Standards Board